

Thomas J. Luz (TL-4665)
KARAAHMETOGLU & LUZ FIRM LLP
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Anu Dhami, Isabel Piaggi, and Dan A. Vidal*
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE MANAGEMENT GROUP, LLC,	:	08-02172 (PKC)
ANDREW FOX, and LEE HEIMAN,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
ANGEL MUSIC GROUP LTD., NEIL	:	
MOFFITT, NICK McCABE, JESSIE ANGLES,	:	
ANU DHAMI, ISABEL PIAGGI, and DAN A.	:	
VIDAL,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF MOTION OF DEFENDANTS JESSIE
ANGLES, ANU DHAMI, ISABEL PIAGGI AND DAN A.
VIDAL TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the annexed Affidavits of Jessie Angles, sworn to on April 7, 2008, Anu Dhami, Sworn to on April 7, 2008, Isabel Piaggi, sworn to on April 7, 2008, and Dan A. Vidal, sworn to on April 7, 2008, the affirmation of Thomas J. Luz, affirmed on June 13, 2008, the exhibit thereto, the accompanying Memorandum of Law, dated June 13, 2008 and all prior proceedings herein, defendants Jessie Angles, Anu Dhami, Isabel Piaggi, and Dan A. Vidal will move this Court, before Honorable P. Kevin Castel at the United States District Courthouse, 500 Pearl Street, Courtroom 12C, New York, New York, on July 14, 2008 at 9:30 a.m. or as soon

thereafter as counsel may be heard, for an order pursuant to F.R. Civ. P. 12(b)(2) dismissing the Complaint as against them, together with such other and further relief as this Court may deem just and proper.

June 13, 2008

KARAAHMETOGLU & LUZ FIRM LLP

by: /s/
Thomas J. Luz (TL-4665)

TO:

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